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17 *Counsel for Plaintiffs*

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LANCE DOWNES-COVINGTON, an
individual, SOLDADERA SANCHEZ, an
individual, ROBERT O'BRIEN, an individual,
EMILY DRISCOLL, an individual, ALISON
KENADY, an individual, TENISHA MARTIN,
an individual, GABRIELA MOLINA, an
individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
LIEUTENANT KURT MCKENZIE, as an
individual and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
OFFICER TABATHA DICKSON, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer;
CAPTAIN PATRICIA SPENCER, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer;
CAPTAIN DORI KOREN, as an individual and
in his capacity as a Las Vegas Metropolitan Police
Department Officer; EVAN SPOON, as an

Case. No.: 2:20-cv-01790-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN
AND SCHEDULING ORDER
DEADLINES**

(NINETEENTH REQUEST)

individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; JORDAN TURNER, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; UNKNOWN OFFICERS 1-14, as individuals and in their capacity as Las Vegas Metropolitan Police Department Officers,

Defendants.

STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN AND SCHEDULING ORDER DEADLINES (NINETEENTH REQUEST)

Plaintiffs Lance Downes-Covington, Soldadera Sanchez, Robert O'Brien, Emily Driscoll, Alison Kenady, Tenisha Martin, and Gabriela Molina ("Plaintiffs"), by and through their attorneys of record, Margaret A. McLetchie, Esq. and Leo S. Wolpert, Esq. with the law firm of McLetchie Law and Defendants, the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD"), Lieutenant Kurt McKenzie ("McKenzie"), Officer Tabatha Dickson ("Dickson"), Captain Patricia Spencer ("Spencer"), Captain Dori Koren ("Koren"), Officer Evan Spoon ("Spoon"), and Officer Jordan Turner ("Turner"), collectively ("LVMPD Defendants"), by and through their attorneys of record, Craig R. Anderson, Esq., with the law firm of Marquis Aurbach, hereby stipulate and agree to extend the Discovery Plan and Scheduling Order deadlines an additional ninety (90) days. This Stipulation is being entered in good faith and not for purposes of delay (supplemented information noted in **bold-face** type).

I. STATUS OF DISCOVERY.

A. PLAINTIFFS' DISCOVERY.

1. Plaintiffs' Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2021;
2. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
3. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;

1 4. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Interrogatories
2 dated May 13, 2021;

3 5. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Interrogatories dated
4 May 13, 2021;

5 6. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Interrogatories dated
6 May 13, 2021;

7 7. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Interrogatories dated
8 May 13, 2021;

9 8. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Interrogatories
10 dated May 13, 2021;

11 9. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of Requests
12 for Production of Documents dated May 13, 2021;

13 10. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Requests for
14 Production of Documents dated May 13, 2021;

15 11. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Requests for
16 Production of Documents dated May 13, 2021;

17 12. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Requests for
18 Production of Documents dated May 13, 2021;

19 13. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Requests for
20 Production of Documents dated May 13, 2021;

21 14. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Requests for
22 Production of Documents dated May 13, 2021;

23 15. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Requests for
24 Production of Documents dated May 13, 2021;

25 16. Plaintiff Lance Downes-Covington's First Set of Interrogatories to LVMPD dated
26 June 2, 2021;

27 17. Plaintiffs' First Set of Requests for Production of Documents to LVMPD dated
28 June 2, 2021;

1 18. Plaintiff Emily Driscoll's First Set of Interrogatories to LVMPD dated July 1, 2021;
2 19. Plaintiffs' First Supplement to Initial Disclosure of Witnesses and Documents
3 Pursuant to FRCP 26.1(a)(1) dated July 1, 2021;
4 20. Plaintiffs' Second Supplement to Initial Disclosure of Witnesses and Documents
5 Pursuant to FRCP 26.1(a)(1) dated July 8, 2021;
6 21. Plaintiffs' Third Supplement to Initial Disclosure of Witnesses and Documents
7 Pursuant to FRCP 26.1(a)(1) dated July 12, 2021;
8 22. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First Set of
9 Interrogatories dated July 8, 2021;
10 23. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set of
11 Interrogatories dated July 8, 2021;
12 24. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set of
13 Interrogatories dated July 8, 2021;
14 25. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set of
15 Interrogatories dated July 8, 2021;
16 26. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set of
17 Interrogatories dated June 8, 2021;
18 27. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First Set of
19 Requests for Production of Documents dated July 8, 2021;
20 28. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set of
21 Requests for Production of Documents dated July 8, 2021;
22 29. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set of
23 Requests for Production of Documents dated July 8, 2021;
24 30. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set of
25 Requests for Production of Documents dated July 8, 2021;
26 31. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set of
27 Requests for Production of Documents dated July 8, 2021;
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1 32. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set of
2 Requests for Production of Documents dated July 8, 2021;

3 33. Plaintiff Gabriela Molina's Second Supplemental Responses to LVMPD's First Set
4 of Requests for Production of Documents dated July 12, 2021;

5 34. Plaintiff Lance Downes-Covington's Supplemental Responses to LVMPD's First
6 Set of Requests for Production of Documents dated July 12, 2021;

7 35. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set of
8 Interrogatories dated July 12, 2021;

9 36. Plaintiff Lance Downes-Covington's Supplemental Responses to LVMPD's First
10 Set of Interrogatories dated July 12, 2021;

11 37. Plaintiff Tenisha Martin's First Set of Interrogatories to LVMPD dated July 13,
12 2021;

13 38. Plaintiffs' Second Set of Requests for Production of Documents to LVMPD dated
14 July 13, 2021;

15 39. Plaintiff Tenisha Martin's Second Set of Interrogatories to LVMPD dated July 14,
16 2021;

17 40. Plaintiffs' Third Set of Requests for Production of Documents to LVMPD dated
18 July 14, 2021;

19 41. Plaintiffs' Fourth Supplement to Initial Disclosure of Witnesses and Documents
20 Pursuant to FRCP 26.1(a)(1) dated September 15, 2021;

21 42. Plaintiff Tenisha Martin's Third Set of Interrogatories to LVMPD dated September
22 15, 2021;

23 43. Plaintiffs' Fourth Set of Requests for Production of Documents to LVMPD dated
24 September 15, 2021;

25 44. Plaintiffs' First Set of Requests for Admission to LVMPD dated September 17,
26 2021;

27 45. Tenisha Martin's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
28 dated December 16, 2021;

1 46. Soldadera Sanchez's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
2 dated December 16, 2021;

3 47. Robert O' Brien's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
4 dated December 16, 2021;

5 48. Lance Downes-Covington's Responses to Lt. Kurt McKenzie's First Set of
6 Interrogatories dated December 16, 2021;

7 49. Gabriela Molina's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
8 dated December 16, 2021;

9 50. Emily Driscoll's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
10 dated December 16, 2021;

11 51. Alison Kenady's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
12 dated December 16, 2021;

13 52. Tenisha Martin's Responses to LVMPD's First Set of Requests for Admissions
14 dated December 16, 2021;

15 53. Soldadera Sanchez's Responses to LVMPD's First Set of Requests for Admissions
16 dated December 16, 2021;

17 54. Robert O'Brien's Responses to LVMPD's First Set of Requests for Admissions
18 dated December 16, 2021;

19 55. Lance Downes-Covington's Responses to LVMPD's First Set of Requests for
20 Admissions dated December 16, 2021;

21 56. Gabriela Molina's Responses to LVMPD's First Set of Requests for Admissions
22 dated December 16, 2021;

23 57. Emily Driscoll's Responses to LVMPD's First Set of Requests for Admissions
24 dated December 16, 2021;

25 58. Alison Kenady's Responses to LVMPD's First Set of Requests for Admissions
26 dated December 16, 2021;

27 59. Alison Kenady's First Set of Interrogatories to LVMPD dated April 1, 2022;

28 60. Emily Driscoll's Second Set of Interrogatories to LVMPD dated April 1, 2022;

- 1 61. Gabriella Molina's First Set of Interrogatories to LVMPD dated April 1, 2022;
- 2 62. Lance Downes-Covington's Second Set of Interrogatories to LVMPD dated April
- 3 1, 2022;
- 4 63. Plaintiffs' Fifth Set of Requests for Production of Documents to LVMPD dated
- 5 April 1, 2022;
- 6 64. Robert O'Brien's First Set of Interrogatories to LVMPD dated April 1, 2022;
- 7 65. Plaintiffs' Second Set of Requests for Admissions to LVMPD dated April 1, 2022;
- 8 66. Sol Sanchez's First Set of Interrogatories to LVMPD dated April 1, 2022;
- 9 67. Plaintiffs' First Set of Requests for Production of Documents to Defendant Joe
- 10 Lombardo [Request Nos. 1-5] dated June 17, 2022;
- 11 68. Plaintiffs' First Set of Requests for Admissions to Defendant Tabatha Dickson
- 12 dated June 17, 2022;
- 13 69. Plaintiffs' First Set of Requests for Production of Documents to Defendant Joe
- 14 Lombardo [Request Nos. 1-4] dated June 17, 2022;
- 15 70. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June 17, 2022;
- 16 71. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 17, 2022;
- 17 72. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 17, 2022;
- 18 73. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated June 17,
- 19 2022;
- 20 74. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD dated
- 21 June 17, 2022;
- 22 75. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 17, 2022;
- 23 76. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 17, 2022;
- 24 77. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha Dickson
- 25 dated June 17, 2022;
- 26 78. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated June 17,
- 27 2022;
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1 79. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated June
2 17, 2022;

3 80. Plaintiffs' First Set of Requests for Production of Documents to Defendant Patricia
4 Spencer dated June 17, 2022;

5 81. Plaintiffs' First Set of Requests for Production of Documents to Defendant Dori
6 Koren dated June 17, 2022;

7 82. Plaintiffs' First Set of Requests for Production of Documents to Joe Lombardo
8 [Request No. 1] dated June 17, 2022;

9 83. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt McKenzie
10 dated June 17, 2022;

11 84. Tenisha Martin's First Set of Interrogatories to Lt. Kurk McKenzie dated June 17,
12 2022;

13 85. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 21, 2022;

14 86. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD dated
15 June 21, 2022;

16 87. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 21, 2022;

17 88. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated June 21,
18 2022;

19 89. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 21, 2022;

20 90. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated June
21 21, 2022;

22 91. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated June 21,
23 2022;

24 92. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June 21, 2022;

25 93. Plaintiffs' First Set of Requests for Admissions to Officer Tabatha Dickson dated
26 June 21, 2022;

27 94. Plaintiffs' First Set of Requests for Production of Documents to Joe Lombardo
28 [Request Nos. 1-5] dated June 21, 2022;

1 95. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt McKenzie
2 dated June 21, 2022;

3 96. Plaintiffs' First Set of Requests for Production of Documents to Officer Tabatha
4 Dickson dated June 21, 2022;

5 97. Plaintiffs' First Set of Requests for Production of Documents to Patricia Spencer
6 dated June 21, 2022;

7 98. Plaintiffs' First Set of Requests for Production of Documents to Captain Dori Koren
8 dated June 21, 2022;

9 99. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha Dickson
10 dated June 21, 2022;

11 100. Tenisha Martin's First Set of Interrogatories to Lt. Kurt McKenzie dated
12 June 21, 2022;

13 101. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 21,
14 2022;

15 102. Plaintiff Emily Driscoll's Requests for Admissions to LVMPD - Set One
16 dated October 27, 2022.

17 103. Plaintiff Emily Driscoll's Interrogatories to LVMPD - Set Four dated
18 October 27, 2022.

19 104. Plaintiff Emily Driscoll's Interrogatories to Tabatha Dickson - Set One
20 dated October 27, 2022.

21 105. Plaintiff Emily Driscoll's Requests for Production of Documents to
22 LVMPD - Set One dated October 27, 2022.

23 106. Plaintiff Emily Driscoll's Requests for Production of Documents to Tabatha
24 Dickson - Set One dated October 27, 2022.

25 107. Plaintiff Emily Driscoll's Requests for Admissions to Tabatha Dickson - Set
26 One dated October 27, 2022.

27 108. Plaintiff Gabriela Molina's Interrogatories to LVMPD - Set Two dated
28 October 27, 2022.

1 109. Plaintiff Gabriela Molina's Interrogatories to Tabatha Dickson - Set One
2 dated October 27, 2022.

3 110. Plaintiff Gabriela Molina's Requests for Production of Documents to
4 LVMPD - Set One dated October 27, 2022.

5 111. Plaintiff Gabriela Molina's Requests for Production of Documents to
6 Tabatha Dickson - Set One dated October 27, 2022.

7 112. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set One
8 dated October 27, 2022.

9 113. Plaintiff Gabriela Molina's Requests for Admissions to Tabatha Dickson -
10 Set One dated October 27, 2022.

11 114. Plaintiff Lance Downes-Covington's Interrogatories to LVMPD - Set Four
12 dated October 27, 2022.

13 115. Plaintiff Lance Downes-Covington's Interrogatories to Tabatha Dickson -
14 Set Two dated October 27, 2022.

15 116. Plaintiff Lance Downes-Covington's Interrogatories to Jordan Turner - Set
16 One dated October 27, 2022.

17 117. Plaintiff Lance Downes-Covington's Requests for Production of Documents
18 to LVMPD - Set One dated October 27, 2022.

19 118. Plaintiff Lance Downes-Covington's Requests for Production of Documents
20 to Tabatha Dickson - Set One dated October 27, 2022.

21 119. Plaintiff Lance Downes-Covington's Requests for Production of Documents
22 to Jordan Turner - Set One dated October 27, 2022.

23 120. Plaintiff Lance Downes-Covington's Requests for Admissions to LVMPD
24 - Set One dated October 27, 2022.

25 121. Plaintiff Lance Downes-Covington's Requests for Admissions to Tabatha
26 Dickson - Set One dated October 27, 2022.

27 122. Plaintiff Lance Downes-Covington's Requests for Admissions to Jordan
28 Turner - Set One dated October 27, 2022.

1 123. Soldadera Sanchez's Requests for Production of Documents to LVMPD -
2 Set One dated November 7, 2022.

3 124. Soldadera Sanchez's Requests for Admissions to LVMPD - Set One dated
4 November 7, 2022.

5 125. Robert O'Brien's Interrogatories to LVMPD - Set One dated November 7,
6 2022.

7 126. Robert O'Brien's Requests for Production of Documents to LVMPD - Set
8 One dated November 7, 2022.

9 127. Robert O'Brien's Requests for Admissions to LVMPD - Set One dated
10 November 7, 2022.

11 128. Alison Kenady's Interrogatories to LVMPD - Set Two dated November 7,
12 2022.

13 129. Alison Kenady's Requests for Production of Documents to LVMPD - Set
14 One dated November 7, 2022.

15 130. Alison Kenady's Requests for Admissions to LVMPD - Set One dated
16 November 7, 2022.

17 131. Tenisha Martin's Requests for Production of Documents to LVMPD - Set
18 One dated November 7, 2022.

19 132. Tenisha Martin's Requests for Admissions to LVMPD - Set One dated
20 November 7, 2022.

21 133. Plaintiffs' Fifth Supplement to Initial Disclosure of Witnesses and
22 Documents Pursuant to FRCP 26.1(a)(1) dated January 4, 2023;

23 134. Plaintiffs' Sixth Supplement to Initial Disclosure of Witnesses and
24 Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2023.

25 135. Tenisha Martin's Requests for Production of Documents to LVMPD - Set
26 Two, dated January 17, 2023.

27 136. Tenisha Martin's Requests for Production of Documents to LVMPD - Set
28 Three, dated April 18, 2023.

137. Plaintiff Lance Downes-Covington's Requests for Production to LVMPD - Set Two dated May 16, 2023.

138. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set Two dated June 14, 2023.

139. Plaintiffs' Eighth Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 30, 2024.

140. Plaintiffs' Ninth Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated February 27, 2024.

141. Plaintiffs' Tenth Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated April 18, 2024.

142. Plaintiffs' Initial Designation of Expert Witness Pursuant to FRCP 26(a)(2) dated September 16, 2024.

B. DEFENDANTS' DISCOVERY.

1. LVMPD Defendants' Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2021.

2. LVMPD's First Set of Interrogatories to Plaintiff Lance Downes-Covington dated March 12, 2021.

3. LVMPD's First Set of Interrogatories to Plaintiff Soldadera Sanchez dated March 12, 2021.

4. LVMPD's First Set of Interrogatories to Plaintiff Robert O'Brien dated March 12, 2021.

5. LVMPD's First Set of Interrogatories to Plaintiff Emily Driscoll dated March 12, 2021.

6. LVMPD's First Set of Interrogatories to Plaintiff Alison Kenady dated March 12, 2021.

1 7. LVMPD's First Set of Interrogatories to Plaintiff Tenisha Martin dated March 12,
2 2021.

3 8. LVMPD's First Set of Interrogatories to Plaintiff Gabriela Molina dated March 12,
4 2021.

5 9. LVMPD's First Set of Request for Production of Documents to Plaintiff Lance
6 Downes-Covington dated March 12, 2021.

7 10. LVMPD's First Set of Request for Production of Documents to Plaintiff Soldadera
8 Sanchez dated March 12, 2021.

9 11. LVMPD's First Set of Request for Production of Documents to Plaintiff Robert
10 O'Brien dated March 12, 2021.

11 12. LVMPD's First Set of Request for Production of Documents to Plaintiff Emily
12 Driscoll dated March 12, 2021.

13 13. LVMPD's First Set of Request for Production of Documents to Plaintiff Alison
14 Kenady dated March 12, 2021.

15 14. LVMPD's First Set of Request for Production of Documents to Plaintiff Tenisha
16 Martin dated March 12, 2021.

17 15. LVMPD's First Set of Request for Production of Documents to Plaintiff Gabriela
18 Molina dated March 12, 2021.

19 16. LVMPD Defendants' First Supplement to Initial Disclosures of Witnesses and
20 Documents Pursuant to FRCP 26.1(a)(1) dated July 20, 2021.

21 17. LVMPD's Answers to Plaintiff Lance Downes-Covington's First Set of
22 Interrogatories dated July 20, 2021.

23 18. LVMPD's Responses to Plaintiffs' First Set of Requests for Production of
24 Documents dated July 20, 2021.

25 19. LVMPD's Responses to Plaintiff Emily Driscoll's First Set of Interrogatories dated
26 August 3, 2021.

27 20. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's First Set
28 of Interrogatories dated August 3, 2021.

1 21.LVMPD's Supplemental Responses to Plaintiffs' First Set of Requests for
2 Production of Documents dated August 3, 2021.

3 22.LVMPD Defendants' Second Supplement to Initial Disclosures of Witnesses and
4 Documents Pursuant to FRCP 26.1(a)(1) dated August 4, 2021.

5 23.LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's First Set
6 of Interrogatories dated August 9, 2021.

7 24.LVMPD Defendants' Third Supplement to Initial Disclosures of Witnesses and
8 Documents Pursuant to FRCP 26.1(a)(1) dated August 16, 2021.

9 25.LVMPD's Responses to Plaintiff Tenisha Martin's First Set of Interrogatories dated
10 August 16, 2021.

11 26.LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of Interrogatories
12 dated August 16, 2021.

13 27.LVMPD's Responses to Plaintiffs' Third Set of Requests for Production of
14 Documents dated August 16, 2021.

15 28.LVMPD's Responses to Plaintiffs' Second Set of Requests for Production of
16 Documents dated August 30, 2021.

17 29.LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of Interrogatories
18 dated August 30, 2021.

19 30.LVMPD Defendants' Fourth Supplement to Initial Disclosures of Witnesses and
20 Documents Pursuant to FRCP 26.1(a)(1) dated August 30, 2021.

21 31.LVMPD Defendants' Privilege Log dated August 30, 2021.

22 32.LVMPD's Amended Responses to Plaintiffs' Third Set of Requests for Production
23 of Documents dated September 13, 2021.

24 33.LVMPD's Amended Responses to Plaintiffs' Second Set of Requests for
25 Production of Documents dated September 13, 2021.

26 34.LVMPD's Amended Responses to Plaintiff Tenisha Martin's Second Set of
27 Interrogatories dated September 13, 2021.

28

1 35.LVMPD's Amended Responses to Plaintiff Emily Driscoll's First Set of
2 Interrogatories dated September 13, 2021.

3 36.Lt. McKenzie's First Set of Interrogatories to Plaintiff Lance Downes-Covington
4 dated September 22, 2021.

5 37.Lt. McKenzie's First Set of Interrogatories to Plaintiff Soldadera Sanchez dated
6 September 22, 2021.

7 38.Lt. McKenzie's First Set of Interrogatories to Plaintiff Robert O'Brien dated
8 September 22, 2021.

9 39.Lt. McKenzie's First Set of Interrogatories to Plaintiff Emily Driscoll dated
10 September 22, 2021.

11 40.Lt. McKenzie's First Set of Interrogatories to Plaintiff Alison Kenady dated
12 September 22, 2021.

13 41.Lt. McKenzie's First Set of Interrogatories to Plaintiff Tenisha Martin dated
14 September 22, 2021.

15 42.Lt. McKenzie's First Set of Interrogatories to Plaintiff Gabriela Molina dated
16 September 22, 2021.

17 43.LVMPD's First Set of Requests for Admission to Plaintiff Lance Downes-
18 Covington dated September 22, 2021.

19 44.LVMPD's First Set of Requests for Admission to Plaintiff Soldadera Sanchez dated
20 September 22, 2021.

21 45.LVMPD's First Set of Requests for Admission to Plaintiff Robert O'Brien dated
22 September 22, 2021.

23 46.LVMPD's First Set of Requests for Admission to Plaintiff Emily Driscoll dated
24 September 22, 2021.

25 47.LVMPD's First Set of Requests for Admission to Plaintiff Alison Kenady dated
26 September 22, 2021.

27 48.LVMPD's First Set of Requests for Admission to Plaintiff Tenisha Martin dated
28 September 22, 2021.

1 49. LVMPD's First Set of Requests for Admission to Plaintiff Gabriela Molina dated
2 September 22, 2021.

3 50. LVMPD Defendants' Fifth Supplement to Initial Disclosures of Witnesses and
4 Documents Pursuant to FRCP 26.1(a)(1) dated October 11, 2021.

5 51. LVMPD's Responses to Plaintiffs' Fourth Set of Requests for Production of
6 Documents dated October 18, 2021.

7 52. LVMPD's Responses to Plaintiff Tenisha Martin's Third Set of Interrogatories
8 dated October 18, 2021.

9 53. LVMPD's Responses to Plaintiffs' First Set of Requests Admission dated October
10 20, 2021.

11 54. LVMPD's Answers to Plaintiff Lance Downes-Covington's Second Set of
12 Interrogatories dated May 5, 2022.

13 55. LVMPD's Answers to Plaintiff Alison Kenady's First Set of Interrogatories dated
14 May 5, 2022.

15 56. LVMPD's Answers to Plaintiff Robert O'Brien's First Set of Interrogatories dated
16 May 5, 2022.

17 57. LVMPD's Answers to Plaintiff Sol Sanchez's First Set of Interrogatories dated
18 May 5, 2022.

19 58. LVMPD's Responses to Plaintiffs' Fifth Set of Requests for Production of
20 Documents dated May 5, 2022.

21 59. LVMPD's Answers to Plaintiff Emily Driscoll's Second Set of Interrogatories
22 dated May 5, 2022.

23 60. LVMPD's Answers to Plaintiff Gabriella Molina's First Set of Interrogatories dated
24 May 5, 2022.

25 61. LVMPD's Responses to Plaintiffs' Second Set of Requests for Admissions dated
26 May 5, 2022.

27 62. LVMPD's Second Supplemental Answers to Plaintiff Lance Downes-Covington's
28 First Set of Interrogatories dated June 24, 2022.

63. LVMPD's First Supplemental Responses to Plaintiffs' Second Set of Requests for Production of Documents dated June 24, 2022.

64. LVMPD's First Supplemental Answers to Plaintiff Tenisha Martin's Second Set of Interrogatories dated June 24, 2022.

65. LVMPD's Second Supplemental Responses to Plaintiffs' First Set of Requests for Production of Documents dated June 24, 2022.

66. Lt. Kurt McKenzie's Answers to Soldadera Sanchez's First Set of Interrogatories dated August 8, 2022.

67. Lt. Kurt McKenzie's Answers to Tenisha Martin's First Set of Interrogatories dated August 8, 2022.

68. Lt. Kurt McKenzie's Responses to Plaintiffs' First Set of Requests for Production of Documents dated August 8, 2022.

69. Patricia Spencer's Responses to Plaintiffs' First Set of Requests for Production of Documents dated August 8, 2022.

70. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for Admissions dated August 8, 2022.

71. Tabatha Dickson's Answers to Lance Downes-Covington's First Set of Interrogatories dated August 8, 2022.

72. LVMPD's Responses to Plaintiffs' Third Set of Requests for Admissions dated August 8, 2022.

73. LVMPD's Answers to Lance Downes-Covington's Third Set of Interrogatories dated August 8, 2022.

74. LVMPD's Answers to Soldadera Sanchez's Second Set of Interrogatories dated August 8, 2022.

75. Captain Dori Koren's Responses to Plaintiffs' First Set of Requests for Production of Documents dated August 8, 2022.

76. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for Production of Documents dated August 8, 2022.

1 77. LVMPD's Answers to Robert O'Brien's Second Set of Interrogatories dated August
2 8, 2022.

3 78. LVMPD's Answers to Tenisha Martin's Fourth Set of Interrogatories dated August
4 8, 2022.

5 79. LVMPD's Responses to Plaintiffs' Sixth Set of Requests for Production of
6 Documents dated August 8, 2022.

7 80. LVMPD's Answers to Emily Driscoll's Third Set of Interrogatories dated August
8 8, 2022.

9 81. LVMPD Defendants' Sixth Supplemental FRCP 26.1 Disclosures dated August 8,
10 2022.

11 82. LVMPD Defendants' Seventh Supplemental FRCP 26.1 Disclosures dated
12 December 6, 2022.

13 83. Jordan Turner's Responses to Lance Downes-Covington's Requests for Production
14 – Set One, dated December 6, 2022.

15 84. Jordan Turner's Responses to Lance Downes-Covington's Requests for Admission
16 – Set One, dated December 6, 2022.

17 85. Jordan Turner's Responses to Lance Downes-Covington's Interrogatories – Set
18 One, dated December 6, 2022.

19 86. Jordan Turner's Responses to Lance Downes-Covington's Requests for Admission
20 – Set One, dated December 6, 2022.

21 87. Jordan Turner's Responses to Gabriela Molina's Requests for Production – Set
22 One, dated December 6, 2022.

23 88. Tabatha Dickson's Responses to Lance Downes Covington's Requests for
24 Production – Set One, dated December 6, 2022.

25 89. Tabatha Dickson's Responses to Lance Downes-Covington's Interrogatories – Set
26 One, dated December 6, 2022.

27 90. Tabatha Dickson's Responses to Lance Downes-Covington's Interrogatories – Set
28 Two, dated December 6, 2022.

1 91. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
2 Admission – Set One, dated December 6, 2022.

3 92. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
4 Production – Set One, dated December 6, 2022.

5 93. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories – Set One, dated
6 December 6, 2022.

7 94. Tabatha Dickson's Responses to Gabriela Molina's Requests for Admission – Set
8 One, dated December 6, 2022.

9 95. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories – Set One, dated
10 December 6, 2022.

11 96. Tabatha Dickson's Responses to Gabriela Molina's Requests for Production – Set
12 One, dated December 6, 2022.

13 97. Tabatha Dickson's Responses to Emily Driscolls' Requests for Admission – Set
14 One, dated December 6, 2022.

15 98. Tabatha Dickson's Responses to Emily Driscolls' Interrogatories – Set One, dated
16 December 6, 2022.

17 99. LVMPD'S Responses to Lance Downes Covington's Requests for Production – Set
18 One, dated December 6, 2022.

19 100. LVMPD'S Responses to Lance Downes Covington's Requests for
20 Admission – Set One, dated December 6, 2022.

21 101. LVMPD'S Responses to Lance Downes Covington's Interrogatories – Set
22 Four, dated December 6, 2022.

23 102. LVMPD's Responses to Emily Driscolls' Interrogatories – Set One, dated
24 December 6, 2022.

25 103. LVMPD's Responses to Emily Driscolls' Interrogatories – Set Four, dated
26 December 6, 2022.

27 104. LVMPD's Responses to Emily Driscolls' Requests for Admission – Set
28 One, dated December 6, 2022.

1 105. LVMPD's Responses to Emily Driscolls' Requests for Production – Set
2 One, dated December 6, 2022.

3 106. LVMPD's Responses to Gabriela Molina's Interrogatories – Set Two, dated
4 December 6, 2022.

5 107. LVMPD's Responses to Gabriela Molina's Requests for Production– Set
6 One, dated December 6, 2022.

7 108. LVMPD's Responses to Gabriela Molina's Requests for Admission – Set
8 One, dated December 6, 2022.

9 109. LVMPD Defendants' Eighth Supplemental FRCP 26.1 Disclosures dated
10 December 16, 2022.

11 110. LVMPD'S Responses to Tenisha Martin's Requests for Admission – Set
12 One, dated December 19, 2022.

13 111. LVMPD'S Responses to Soldadera Sanchez's Requests for Admission –
14 Set One, dated December 19, 2022.

15 112. LVMPD'S Responses to Robert O'Brien's Requests for Admission – Set
16 One, dated December 19, 2022.

17 113. LVMPD'S Responses to Alison Kenady's Requests for Admission – Set
18 One, dated December 19, 2022.

19 114. LVMPD'S Responses to Robert O'Brien's Interrogatories – Set One, dated
20 December 19, 2022.

21 115. LVMPD'S Responses to Alison Kenady's Requests for Production – Set
22 One, dated December 20, 2022.

23 116. LVMPD'S Responses to Robert O'Brien's Requests for Production – Set
24 One, dated December 20, 2022.

25 117. LVMPD's Responses to Soldadera Sanchez' Requests for Production – Set
26 One, dated December 20, 2022.

27 118. LVMPD'S Responses to Tenisha Martin's Requests for Production – Set
28 One, dated December 20, 2022.

1 119. LVMPD'S Responses to Alison Kenady's Interrogatories – Set Two, dated
2 January 4, 2023.

3 120. LVMPD'S Responses to Robert O'Brien's Interrogatories – Set Three,
4 dated January 4, 2023.

5 121. LVMPD'S Responses to Alison Kenady's Interrogatories - Set Two, dated
6 January 4, 2023.

7 122. LVMPD'S Responses to Robert O'Brien's Interrogatories - Set Three,
8 dated January 4, 2023.

9 123. LVMPD's Ninth Supplemental Disclosure of Witnesses and Documents
10 Pursuant to FRCP 26.1(a)(1), dated February 16, 2023.

11 124. LVMPD's First Supplemental Answers to Plaintiff Robert O'Brien's First
12 Set of Interrogatories, dated February 16, 2023.

13 125. LVMPD's First Supplemental Answers to Plaintiff Soldadera Sanchez's
14 Second Set of Interrogatories, dated February 16, 2023.

15 126. LVMPD's Third Supplemental Responses to Plaintiffs' First Set of
16 Requests for Production of Documents, dated February 16, 2023.

17 127. LVMPD's Second Supplemental Responses to Plaintiff's Second Set of
18 Requests for Production of Documents, dated February 16, 2023.

19 128. LVMPD's First Supplemental Responses to Plaintiffs' Sixth Set of
20 Requests for Production of Documents, dated February 16, 2023.

21 129. LVMPD'S Responses to Plaintiff Tenisha Martin's Requests for Production
22 of Documents - Set One [sic Set Two], dated February 16, 2023.

23 130. LVMPD's Tenth Supplemental Disclosure of Witnesses and Documents
24 Pursuant to FRCP 26.1(a)(1), dated February 24, 2023.

25 131. LVMPD's Responses to Tenisha Martin's Requests for Production of
26 Documents - Set Three dated May 22, 2023.

27 132. LVMPD's Responses to Gabriela Molina's Requests for Admissions - Set
28 Two dated July 17, 2023.

133. LVMPD's Responses to Lance Downes-Covington's Requests for Production of Documents - Set Two dated July 17, 2023.

134. LVMPD's Eleventh Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1), dated July 17, 2023.

135. LVMPD's Twelfth Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1), dated April 24, 2024.

136. LVMPD's Initial Designation of Expert Witness Pursuant to FRCP 26(a)(2) dated September 17, 2024.

C. DEPOSITIONS.

1. LVMPD Defendants deposed Plaintiff Alison Kenady on August 9, 2022.
2. LVMPD Defendants deposed Plaintiff Gabriela Molina on August 10, 2022.
3. LVMPD Defendants deposed Plaintiff Emily Driscoll on August 11, 2022.
4. LVMPD Defendants deposed Plaintiff Tenisha Martin on August 16, 2022.
5. LVMPD Defendants deposed Plaintiff Lance Downes-Covington on August 19, 2022.
6. LVMPD Defendants deposed Plaintiff Soldadera Sanchez on August 20, 2022.
7. Plaintiffs deposed Defendant Officer Jordan Turner on October 18, 2022.
8. Plaintiffs deposed Defendant Officer Tabatha Dickson on October 24, 2022.
9. Plaintiffs deposed Defendant Officer Evan Spoon on November 7, 2022.
10. Plaintiffs deposed Defendant Retired Captain Patricia Spencer on November 15, 2022.
11. Plaintiffs deposed Defendant Captain Dori Koren on November 22, 2022.
12. Plaintiffs deposed Defendant Lt. Kurt McKenzie on December 21, 2022.
13. LVMPD Defendants deposed Plaintiff Robert O'Brien on March 24, 2023.
14. Plaintiffs deposed LVMPD Defendants' FRCP 30(b)(6) designee(s) - Lt. Landon Reyes on June 20, 2023.

1 15. Plaintiffs' Deposition Subpoena to Las Vegas Justice Court per FRCP 30(b)(6) for
2 records related to Defendants' citations and arrests during the 2020 BLM Protests.

3 16. Plaintiffs' Deposition Subpoena to Las Vegas Municipal Court per FRCP 30(b)(6)
4 for records related to Defendants' citations and arrests during the 2020 BLM Protests.

5 17. Plaintiffs deposed Defendants' FRCP 30(b)(6) designee(s) (Dori Koren) on April
6 26, 2024.

7 **18. Plaintiffs will be deposing Defendants' FRCP 30(b)(6) designee(s) (John**
8 **McGrath) in March or April 2025.**

9 **19. Plaintiffs will be deposing Defendants' Use of Force Expert (John "Jack"**
10 **Ryan) in March or April 2025.**

11 **20. Defendants will be deposing Plaintiffs' Use of Force Expert (Roger Clark) in**
12 **March or April in 2025.**

13 **21. The Parties have been corresponding about and are further meeting and**
14 **conferring about written discovery issues on February 11, 2025.**

15 **II. DISCOVERY THAT REMAINS TO BE COMPLETED.**

16 The Parties are actively conducting discovery and have completed the majority of
17 the written discovery and depositions. However, the Parties are continuing to meet and confer
18 on outstanding discovery issues.

19 The Parties' primary remaining discovery tasks include: (1) Plaintiffs have
20 subpoenaed records from the Las Vegas Municipal Court and Las Vegas Justice Court for
21 documents concerning Defendant's misdemeanor citations and arrests during the BLM
22 Protests in 2020 and are in the process of obtaining records related to the same; (2) resolution
23 of meet and confer issues and motion practice if needed; (3) Plaintiffs' deposition of
24 Defendant Las Vegas Metropolitan Police Department's FRCP 30(b)(6) designee John
25 McGrath; (4) Plaintiffs' deposition of Defendants' Use of Force Expert (John "Jack" Ryan);
26 (5) Defendants' deposition of Plaintiffs' Use of Force Expert (Roger Clark); and (6) expert
27 rebuttal reports.
28

1 **III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.**

2 This is the **nineteenth** request for an extension of discovery deadlines in this matter.
 3 The Parties request that the Discovery Plan and Scheduling Order deadlines be extended an
 4 additional ninety (90) days so that the Parties may complete the tasks above and efficiently
 5 manage expert disclosures. **This involves waiting for deposition transcripts requiring**
 6 **expert review and analysis and Defendants need to supplement their production of Bates**
 7 **stamped documents.**

8 The Parties acknowledge that, pursuant to local Rule 26-3, the Parties must
 9 establish that good cause exists to extend the deadlines.

10 The Parties have been diligently conducting discovery and continue to conduct
 11 discovery, but an extension is still needed to efficiently conclude discovery and manage the
 12 case. The Parties are cognizant of the Court's recent admonition that it will be looking closely
 13 at any further extension of discovery deadlines. ECF 198 at 26:21-23. However, recent
 14 staffing changes at counsels' office for both Plaintiffs and Defendants has resulted in the
 15 need for additional time to review the voluminous discovery in this case, particularly the
 16 thousands of hours of body worn camera footage which needs to be addressed at the
 17 depositions of the use of force experts on both sides of this litigation. The primary attorneys
 18 handling this complex case on both sides of the litigation have both left their respective firms
 19 in recent months. Both parties experts have requested additional time due to the voluminous
 20 amount of documents and bodyworn camera video.

21 The parties are continuing to meet and confer with Defendants' counsel regarding
 22 various outstanding written discover issues. Meet and confer efforts are ongoing. Likewise,
 23 the experts retained in this matter will also need to review the recent discovery responses,
 24 the parties' supplemental responses (if any) and documents, information and documents in
 25 response to Plaintiffs' subpoenas to Justice Court and Municipal Court, and all deposition
 26 transcripts, including the two FRCP 30(b)(6) designees—Dori Koren and John McGrath.
 27 Counsel are conferring to schedule a deposition date for John McGrath for March or April
 28 of 2025 due to the schedule conflicts of counsel and the designees, as well as the deposition

1 dates for Plaintiffs' use of force expert Roger Clark and Defendants' use of force expert John
 2 "Jack" Ryan, who likewise had scheduling difficulties. These depositions will occur after the
 3 current deadline for rebuttal expert disclosures.

4 Additionally, as noted above the recent departure of the lead attorneys on both sides
 5 of this litigation combined with the extensive body worn camera footage in this case
 6 necessitates the additional extension of time in order to carry out effective depositions of the
 7 use of force experts in this case¹. The deadline also considers that dispositive motions are
 8 likely and organizing and drafting comprehensive and complete motions will require all
 9 deposition transcripts and outstanding discovery. Thus, the remaining discovery is necessary
 10 for properly briefed summary judgment motions.

11 Thus, the standards to extend all deadlines, including the expert deadlines, are
 12 satisfied here.

13 The Parties thus respectfully request an extension of time to enable them to conduct
 14 necessary discovery and so that this matter is fairly resolved on the merits. "Good cause to
 15 extend a discovery deadline exists 'if it cannot reasonably be met despite the diligence of the
 16 party seeking the extension.'" *Derosa v. Blood Sys., Inc.*, No. 2:13-cv-0137-JCM-NJK, 2013
 17 U.S. Dist. LEXIS 108235, 2013 WL 3975764, at 1 (D. Nev. Aug. 1, 2013) (*quoting Johnson*
 18 *v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)); see also Fed. R. Civ. P. 1
 19 (providing that the Rules of Civil Procedure "should be construed, administered, and
 20 employed by the court and the Parties to secure the just, speedy, and inexpensive
 21 determination of every action and proceeding"). As the procedural history of this case
 22

23 ¹ Further, as noted in the most recent stipulation and order extending discovery deadlines in
 24 this matter (ECF No. 198), counsel for Plaintiffs have faced unprecedented personal and
 25 professional challenges which has required them to spend time out of the office (and/or out
 26 of the jurisdiction). In addition to the deaths of Mr. Wolpert's father and Ms. McLetchie's
 27 mother, as well as Pieter O'Leary, a senior attorney at McLetchie Law, leaving the firm, Ms.
 28 McLetchie and Mr. Wolpert have faced unanticipated professional demands, such as ordered
 supplemental briefing in a matter before the Nevada Supreme Court after oral argument was
 completed as well as catching up on cases that were extended due to their prior
 circumstances. These circumstances further compound the need for an extension of the
 discovery deadlines.

illustrates, the Parties have been diligent in litigating this matter. Significant written discovery has been exchanged, nearly all depositions are complete, experts are engaged, and counsel continue to meet and confer regarding various topics. Additionally, counsel for the Parties in this matter are litigating several other unrelated matters (including against each other) which have competing demands. While competing demands of litigation are merely one of many reasons for the instant request, it should be noted that the other litigation between the same counsel involving similar issues can only benefit from the completion of discovery in this matter so that in other litigation, similar requests can be expedited and can further the resolution of those matters and the interests of justice. Indeed, counsel for the Parties continue to engage in settlement discussions regarding this and the other matters they are litigating that stem from the BLM protests. Thus, the standards to extend all deadlines, including the expert deadlines, is satisfied here.

Based on the foregoing stipulation and proposed deadlines, the Parties thus respectfully request an extension of time to extend the deadlines in this matter to enable to them to conduct necessary discovery and so that this matter is fairly resolved on the merits.

IV. PROPOSED SCHEDULE FOR REMAINING DEADLINES

Event	Current Deadline	Proposed New Deadline
Amend Pleadings and Add Parties	June 14, 2022	Past/Unchanged
Initial Expert Disclosures	September 16, 2024	Past/Unchanged
Rebuttal Expert Disclosures	December 20, 2024	Past/Unchanged
Discovery Cut-Off	March 11, 2025	June 9, 2025
Dispositive Motions	May 5, 2025	August 4, 2025 ²
Pretrial Order	May 16, 2025 (If dispositive motions are filed, the deadline for shall be suspended until thirty (30) days after the decision of the	September 10, 2025 ³ (If dispositive motions are filed, the deadline for shall be suspended until thirty (30) days after the decision of the

² 90 days from May 5, 2025, is Sunday, August 3, 2025, a non-judicial day. The next judicial day is Monday, August 4, 2025. *See* Fed. R. Civ. P. 6(a)(1)(C).

³ This date includes an additional seven (7) days to account for the Labor Day holiday.

Event	Current Deadline	Proposed New Deadline
	dispositive motions or further order of the Court.)	dispositive motions or further order of the Court.)

Based on the foregoing stipulation and proposed deadlines plan, the Parties request that the Discovery Plan and Scheduling Order deadlines be extended an additional ninety (90) days so that the Parties may conduct additional discovery, depose expert witnesses, and efficiently manage rebuttal expert disclosures.

Dated this 11th day of February, 2025.

MCLETCHE LAW

By: /s/ Margaret A. McLetchie

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Dated this 11th day of February, 2025.

MARQUIS AURBACH

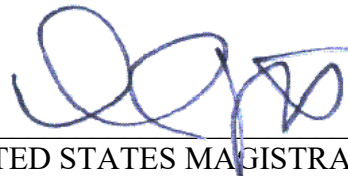
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Lieutenant Kurt McKenzie, Officer
Tabatha Dickson, Captain Patricia
Spencer, Captain Dori Koren, Officer
Evan Spoon and Officer Jordan Turner*

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 2/12/2025